UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DR. KAROLINA MARCINIAK-DOMINGUES GONCALVES AGRA and MR. PEDRO MARCINIAK-DOMINGUES GONCALVES AGRA,) Plaintiffs,) v.) CENTER FOR BRAINS, MINDS AND MACHINES AT MASSACHUSETTS INSTITUTE OF TECHNOLOGY, *et al.*,) Defendants.)	Case No. 1:22-cv-10959 (ALC) **ORAL ARGUMENT REQUESTED**

NOTICE OF MASSACHUSETTS INSTITUTE OF TECHNOLOGY'S
MOTION TO DISMISS THE AMENDED COMPLAINT

Pursuant to Federal Rules of Civil Procedure 8 and 12, Defendant Massachusetts Institute of Technology ("MIT") moves to dismiss the Amended Complaint (Dkt. 65, the "Complaint") in its entirety and with prejudice. As grounds for this Motion, MIT states as follows:

The Complaint should be dismissed for the reasons stated in the Memorandum of Law in Support of MIT's Motion to Dismiss the Amended Complaint, and the Declarations of Jennifer L. Chunias and Glen Shor in Support of MIT's Motion to Dismiss the Amended Complaint and accompanying exhibits.

WHEREFORE, MIT respectfully requests that this Court issue an Order dismissing the Complaint in its entirety and with prejudice, and granting such other and further relief as the Court deems just and proper.

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Dated: December 15, 2023

Respectfully submitted,

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY

By their attorneys,

/s/ Jennifer L. Chunias

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CERTIFICATE OF SERVICE

I, Jennifer L. Chunias, hereby certify that a copy of the foregoing Declaration in Support of Massachusetts Institute of Technology's Motion to Dismiss the Amended Complaint, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on December 15, 2023.

Dated: December 15, 2023   */s/ Jennifer L. Chunias*